

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: ARC AIRBAGS INFLATORS
PRODUCTS LIABILITY LITIGATION

ALL CASES

Case No.: 1:22-md-03051-ELR

MDL No. 3051

Judge Eleanor L. Ross

**UNOPPOSED MOTION FOR
EXTENSION OF BRIEFING
DEADLINES WITH RESPECT
TO PLAINTIFFS' MOTION
FOR JURISDICTIONAL
DISCOVERY AS TO
DEFENDANT AUDI AG**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs respectfully request that the Court (1) grant Specially Appearing Defendant Audi Aktiengesellschaft (“Audi AG”) a 16-day extension, through and including April 9, 2025, within which to file their Response to Plaintiffs’ Motion for Jurisdictional Discovery as to Audi AG (the “Jurisdictional Discovery Motion”); and (2) grant Plaintiffs a 7-day extension, through and including April 30, 2025, within which to file their reply in further support of their Jurisdictional Discovery Motion as to Audi AG.

In support thereof, Plaintiffs state as follows:

1. On January 24, 2025, specially appearing defendant Audi AG moved to dismiss Plaintiffs' Consolidated Corrected Class Action Complaint (the "Audi AG Motion to Dismiss"). Dkt. 305.

2. Pursuant to the Parties' agreement, and as approved by this Court, Plaintiffs filed their opposition to the Audi AG Motion to Dismiss on March 10, 2025. Dkt. 307; *see* Dkt. 292 (order granting Audi AG's unopposed motion for an extension of time).

3. On March 10, 2025, Plaintiffs also filed their Jurisdictional Discovery Motion as to Audi AG. Dkt. 322.

4. Audi AG's reply in further support of its Motion to Dismiss is due on April 9, 2025. Dkt. 292.

5. Pursuant to Local Rule 7.1(B), Audi AG's Opposition to the Jurisdictional Discovery Motion would be due on March 24, 2025.

6. Pursuant to Local Rule 7.1(C), Plaintiffs' Reply in further support of the Jurisdictional Discovery Motion would be due on April 7, 2025.

7. The Parties agree that the Audi AG Motion to Dismiss and the Jurisdictional Discovery Motion raise overlapping issues with respect to Audi AG's motion to dismiss for lack of personal jurisdiction. Accordingly, the Parties agree it would be most efficient for Audi AG to file its Reply in further support of

its Motion to Dismiss at the same time that it files its Response to the Jurisdictional Discovery Motion.

8. Thus, Plaintiffs request that Audi AG be permitted to file its Response to Plaintiffs' Jurisdictional Discovery Motion on **April 9, 2025**. This is the same day that Audi AG's Reply in further support of its Motion to Dismiss is due, and it represents only a 16-day extension of time for Audi AG's Response to the Jurisdictional Discovery Motion.

9. Because this extension would provide Audi AG extra time to respond to Plaintiffs' Jurisdictional Discovery Motion, the Parties agree that Plaintiffs should also receive extra time for their Reply.

10. Accordingly, Plaintiffs request that they be permitted to file their Reply in further support of their Jurisdictional Discovery Motion on **April 30, 2025**. This date represents only a 7-day extension of time from what Local Rule 7.1(C) would otherwise prescribe for Plaintiffs' Reply, based on a Response date of April 9, 2025 (*see supra ¶ 8*).

11. The Court has granted similar extensions with respect to motions for jurisdictional discovery as to the other non-U.S. defendants. Dkt. 296, 314.

Therefore, for good cause shown, Plaintiffs respectfully request that the Court (1) extend Audi AG's deadline to respond to Plaintiffs' Jurisdictional Discovery Motion until April 9, 2025; and (2) extend Plaintiffs' deadline to file a reply in support

of their Jurisdictional Discovery Motion until April 30, 2025. A proposed order granting this relief is attached.

Dated: March 18, 2025

/s/ Roland Tellis

Roland Tellis

rtellis@baronbudd.com

David Fernandes

dfernandes@baronbudd.com

Adam Tamburelli

atamburelli@baronbudd.com

Jay Licher

jlicher@baronbudd.com

Sterling Cluff

scluff@baronbudd.com

BARON & BUDD, P.C.

15910 Ventura Blvd #1600

Encino, California 91436

Tel: (818) 839-2333

Respectfully submitted,

/s/ Demet Basar

Demet Basar

demet.basar@beasleyallen.com

W. Daniel "Dee" Miles, III

dee.miles@beasleyallen.com

J. Mitch Williams

mitch.williams@beasleyallen.com

Dylan T. Martin

dylan.martin@beasleyallen.com

**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES,
P.C.**

272 Commerce Street

Montgomery, Alabama 36104

Tel: (334) 269-2343

H. Clay Barnett, III (GA Bar 174058)

clay.barnett@beasleyallen.com

Thomas P. Willingham (GA Bar
235049)

tom.willingham@beasleyallen.com

**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES,
P.C.**

Overlook II

2839 Paces Ferry Rd SE, Suite 400

Atlanta, GA 30339

Tel: (404) 751-1162

/s/ James E. Cecchi

James E. Cecchi
jcecchi@carellabyrne.com
**CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.**
5 Becker Farm Road
Roseland, New Jersey 07068
Tel: (973) 994-1700

Zachary Jacobs
zjacobs@carellabyrne.com
**CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.**
222 South Riverside Plaza
Chicago, Illinois 60606
Tel: (973) 994-1700

Jason H. Alperstein
jalperstein@carellabyrne.com
Zachary J. Bower
zbower@carellabyrne.com
**CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.**
2222 Ponce De Leon Blvd.
Miami, Florida 33134
Tel: (973) 994-1700

/s/ Elizabeth T. Castillo

Niall P. McCarthy
nmccarthy@cpmlegal.com
Elizabeth T. Castillo
ecastillo@cpmlegal.com
David G. Hollenberg
dhollenberg@cpmlegal.com
**COTCHETT, PITRE &
McCARTHY, LLP**
840 Malcolm Road
Burlingame, CA 94010
Tel: (650) 697-6000

Theresa E. Vitale
tvitale@cpmlegal.com
**COTCHETT, PITRE &
McCARTHY, LLP**
2716 Ocean Park Blvd., Suite 3088
Santa Monica, CA 90405
Tel: (310) 392-2008

/s/ David Stellings

David Stellings
dstellings@lchb.com
Michael J. Miarmi
mmiarmi@lchb.com
Katherine I. McBride
kmcbride@lchb.com
Gabriel A. Panek
gpanek@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, New York 10013-1413
Tel: (212) 355-9500

/s/ Matthew D. Schultz

Matthew D. Schultz
mschultz@levinlaw.com
William F. Cash
bcash@levinlaw.com
LEVIN, PAPANTONIO, RAFFERTY, PROCTOR, BUCHANAN, O'BRIEN, BARR & MOUGEY, P.A.
316 S. Baylen St., Suite 600
Pensacola, FL 32502
Tel: (850) 435-7140

Nimish R. Desai

ndesai@lchb.com

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

275 Battery Street, 29th Floor
San Francisco, California 94111
Tel: (415) 956-1000

/s/ Kevin R. Dean

Kevin R. Dean (GA Bar 214855)

kdean@motleyrice.com

Ann K. Ritter

aritter@motleyrice.com

Lance V. Oliver

loliver@motleyrice.com

Sara O. Couch

scouch@motleyrice.com

MOTLEY RICE LLC

28 Bridgeside Boulevard
Mount Pleasant, South Carolina 29464
Tel: (843) 216-9000

Leadership Committee for Plaintiffs and the Proposed Classes

/s/ Michael A. Caplan

Michael A. Caplan (GA Bar 601039)
mcaplan@caplancobb.com
T. Brandon Waddell (GA Bar 252639)
bwaddell@caplancobb.com
Ashley C. Brown (GA Bar 287373)
abrown@caplancobb.com
CAPLAN COBB LLC
75 Fourteenth Street NE, Suite 2700
Atlanta, Georgia 30309
Tel: (404) 596-5600

/s/ M.J. Blakely

M.J. Blakely (GA Bar 708906)
mjblakely@blakelyfirm.com
THE BLAKELY FIRM, L.L.C.
P.O. Box 3314
Decatur, GA 30031
Tel: (404) 491-0617

Liaison Counsel for Plaintiffs and the Proposed Classes

CERTIFICATION

Pursuant to Civil Local Rule 7.1, the undersigned counsel certifies that this brief has been prepared with one of the font and point selections approved by the Court in Civil Local Rule 5.1.

/s/ David Stellings _____
David Stellings